

COMMON INCIDENT COMMAND CENTER SITUATIONS

DRUG LAB CHEMICALS

(MAY 2005)

Potential Contacts and/or Report Distribution:

- **Regional Office**
- E-mail (January 4, 2005 memo on Guidance for EER E-Mail Messages) if an EER response is made.

Duty Officer Considerations:

- Chemicals to Clandestine Drug Lab Collection Stations--Record caller information on an incident report form and provide the caller with an incident number. Perpetrator information is not to be recorded on the incident report.
- On-site assistance--if requested, EER personnel should be sent to assist local government officials segregate, overpack, and transport chemicals to the nearest clandestine drug lab collection station. Instruct EER responders NOT to stay at the site unless law enforcement personnel are present. Always send EER responders in pairs to labs in need of EER assistance in order to complete a cleanup.

If a duty officer is contacted during office hours or after hours by a DEA contractor for generator ID numbers, we should provide them with a pair (one federal #, one state #) of our provisional ID numbers. However, the numbers are only needed if the total weight of HAZARDOUS WASTE exceeds 220 pounds. Anything less than 220 pounds is considered a "conditionally exempt small quantity generator (CESQG)" which does not require ID numbers. A load of CESQG waste still needs to be manifested for transport, but in the spaces at the top of the manifest where ID numbers are needed, the letters "CESQG" should be used instead.

We keep a file of our provisional ID numbers in ESP fileroom, in the bottom drawer of the right-hand black haz-waste file cabinet. The file is marked "RCRA - Temporary ID numbers - 4053". It is essential that if you issue a set of these ID numbers, you must record in the file that the numbers were issued along with the date, the site name, and the incident number. That way, we don't make the mistake of issuing the numbers to someone else in the future. Once a set of ID numbers has been used, they should never be used at another location - they are unique to a physical address. In addition to our internal tracking system (i.e. the aforementioned file), if you issue ID numbers to anyone, you must send a brief email to Brett Bottomley at HWP to let him know who, what, when, and where the numbers were issued so he can track them. Put a copy of the email in the 4053 file as a record. That way, if the person to whom the ID numbers were issued does not file the required paperwork (i.e., notification of regulated waste activity, annual generator report) with the HWP, then the HWP knows whom to contact to get the information. In these cases, the DEA contractor is the one responsible for filing the paperwork with the HWP, not the duty officer. The contractor is exempt from paying the usual \$100 registration fee.

Alan Reinkemeyer and Larry Lehman have available provisional ID numbers with them at all times. If a duty officer gets an after-hours request they should call Alan or Larry for the ID number. If Alan or Larry are unavailable, contact the pager person or another ESP EER person located in Jefferson City to request the Temporary ID numbers from the ESP fileroom.